

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LG PHILIPS LCD CO., LTD.,	)	
	)	
Plaintiff,	)	C.A. No. 05-292 (JJF)
	)	
v.	)	<b>DEMAND FOR JURY TRIAL</b>
	)	
TATUNG COMPANY; TATUNG	)	
COMPANY OF AMERICA, INC.;	)	<b>REDACTED - PUBLIC VERSION</b>
CHUNGHWA PICTURE TUBES, LTD.;	)	
AND VIEWSONIC CORPORATION,	)	
	)	
Defendants.	)	

**DECLARATION OF STEVEN YOVITS IN SUPPORT OF  
DEFENDANTS' MOTION FOR ATTORNEYS' FEES AND EXPENSES**

STATE OF DELAWARE            )  
  ) ss.  
NEW CASTLE COUNTY         )

Steven Yovits, being duly sworn, deposes and says:

1. My name is Steven Yovits. I am an attorney with the law firm of Howrey, LLP., 321 N. Clark Street, Chicago, Illinois 60610.
2. I am counsel for Defendants Chunghwa Picture Tubes, Ltd., Tatung Company, Tatung Company of America, Inc. and Viewsonic Corporation in the above-captioned matter.
3. I submit this declaration in support of Defendants' Motion for Attorneys' Fees and Expenses.
4. Attached hereto as **Exhibit 1** is a true and correct copy of relevant portions of Defendants' First Set of Document Requests served on December 16, 2005.
5. Attached hereto as **Exhibit 2** is a true and correct copy of Korean patent

application KR2001-0065166 ('166 application) (LPLII 102795-102802).

6. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff's Privilege and Redaction Log.

7. Attached hereto as **Exhibit 4** is a true and correct copy of an email from Ki Ryong Jung (LPLII 07583) with translation and certificate of translation.

8. Attached hereto as **Exhibit 5** is a true and correct copy of an email to Ki Ryong Jung (LPLII 07613-07615) with translation and certificate of translation.

9. Attached hereto as **Exhibit 6** is a true and correct copy of an email from Ki Ryong Jung (LPLII 07674) with translation and certificate of translation.

10. Attached hereto as **Exhibit 7** is a true and correct copy of an email from Ki Ryong Jung (LPLII 07676) with translation and certificate of translation.

11. Attached hereto as **Exhibit 8** is a true and correct copy of an email to Ki Ryong Jung (LPLII 11631-11632) with translation and certificate of translation.

12. Attached hereto as **Exhibit 9** is a true and correct copy of a document bates labeled LPLII 11602-11615, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

13. Attached hereto as **Exhibit 10** is a true and correct copy of a letter from Cass Christenson to Julie Gabler and Christine Dudzik dated March 27, 2006.

14. Attached hereto as **Exhibit 11** is a true and correct copy of a document bates labeled LPLII 07164, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

15. Attached hereto as **Exhibit 12** is a true and correct copy of a document bates

labeled LPLII 05928, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

16. Attached hereto as **Exhibit 13** is a true and correct copy of a document bates labeled LPLII 05935-05936, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

17. Attached hereto as **Exhibit 14** is a true and correct copy of a document bates labeled LPLII 05998, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

18. Attached hereto as **Exhibit 15** is a true and correct copy of a document titled "LB121S1-A2 TCP meeting" dated September 21, 1999 (LPLII 07105).

19. Attached hereto as **Exhibit 16** is a true and correct copy of a bill of materials (BOM) list dated October 13, 1999 (LPLII 07096-07098).

20. Attached hereto as **Exhibit 17** is a true and correct copy of a letter from Julie Gabler to Cass Christenson dated March 7, 2006.

21. Attached hereto as **Exhibit 18** is a true and correct copy of a document labeled LPLII 102785-102786, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

22. Attached hereto as **Exhibit 19** is a true and correct copy of a document labeled LPLII 102328-102347, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

23. Attached hereto as **Exhibit 20** is a true and correct copy of a document labeled LPLII 102754-102758, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

24. Attached hereto as **Exhibit 21** is a true and correct copy of a bill of materials (BOM) list dated June 7, 1999 (LPLII 06286-06288).

25. Attached hereto as **Exhibit 22** is a true and correct copy of a bill of materials

(BOM) list dated October 24, 1999 (LPLII 06474-06476).

26. Attached hereto as **Exhibit 23** is a letter from Cass Christenson to Christine Dudzik dated February 15, 2006 and enclosing documents labeled LPLII 01317-08046.

27. Attached hereto as **Exhibit 24** is a letter from Cass Christenson to Christine Dudzik dated February 16, 2006 and enclosing documents labeled LPLII 08047-12141.

28. Attached hereto as **Exhibit 25** is a letter from Cass Christenson to Christine Dudzik dated February 17, 2006 and enclosing documents labeled LPLII 12142-13241.

29. Attached hereto as **Exhibit 26** is a letter from Cass Christenson to Christine Dudzik dated February 18, 2006 and enclosing documents labeled LPLII 13242-102210.

30. Attached hereto as **Exhibit 27** is a letter from Cass Christenson to Christine Dudzik dated February 20, 2006 and enclosing documents labeled LPLII 102211-102291.

31. Attached hereto as **Exhibit 28** is a letter from Cass Christenson to Christine Dudzik dated March 16, 2006 and enclosing documents labeled LPLII 102292-102833.

32. Attached hereto as **Exhibit 29** is a true and correct copy of a document labeled LPLII 07106, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

33. Attached hereto as **Exhibit 30** is a true and correct copy of relevant portions of Defendants' First Set of Interrogatories served on December 16, 2006.

34. Attached hereto as **Exhibit 31** is a true and correct copy of relevant portions of Plaintiff LG.Philips LCD Co., Ltd.'s Objections and Answers to Defendants First Set of Interrogatories served on January 17, 2006.

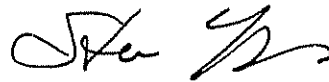
35. Attached hereto as **Exhibit 32** is a true and correct copy of relevant portions of

Plaintiff's Supplemental Responses and Objections to Defendants' First and Second Sets of Interrogatories served February 28, 2006.

36. Attached hereto as **Exhibit 33** is a true and correct copy of a document labeled LPLII 012010-012011, and produced by Plaintiff LG.Philips, LCD Co. Ltd. in this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 10<sup>th</sup> day of October, 2006.

A handwritten signature in black ink, appearing to read 'Steven Yovits', is written above a horizontal line.

Steven Yovits

**UNITED STATES DISTRICT COURT  
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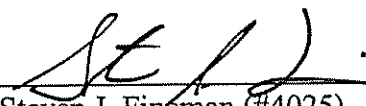
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 10, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

Richard D. Kirk  
The Bayard Firm  
222 Delaware Avenue, Suite 900  
P.O. Box 25130  
Wilmington, DE 19899

I hereby certify that on October 10, 2006, I sent the foregoing document by Electronic Mail, to the following non-registered participants:

Gaspare J. Bono  
Matthew T. Bailey  
Andrew J. Park  
Adrian Mollo  
McKenna Long & Aldridge LLP  
1900 K Street, NW  
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Richards, Layton & Finger  
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P.O. Box 551  
Wilmington, DE 19899

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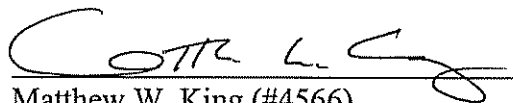
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 18, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

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